

## IMPORTANT POINTS FOR COMPLETING VERIFICATION



The U.S. Department of Agriculture (USDA) regulations require that sponsors of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that collect and review free and reduced-price meal applications must conduct verification by November 15 of each year to confirm students' eligibility for free and reduced-price school meals. Prior to conducting verification, staff should refer to the U.S. Department of Agriculture's (USDA) [\*Eligibility Manual for School Meals\*](#), revised July 2015.

This handout summarizes the important points that school food authorities (SFAs) must consider when completing verification. It should be reviewed by all personnel who conduct verification.

- Refer to the Connecticut State Department of Education's (CSDE) [\*Verification Calendar\*](#). This new tool helps verifying officials with timely completion of the verification process.
- Start on **October 1**. The number selected for verification must be based on the total number of **newly approved** applications, i.e., Income, Temporary Family Assistance (TFA) and Supplemental Nutrition Assistance Program (SNAP) on file by October 1.
- Local education agencies (LEAs) are not allowed to conduct 100 percent verification at the time of application. Additionally, LEAs cannot verify more than the sample size that is required. For example, a LEA cannot select a few "extra" households to verify to be on the "safe side." A LEA may only verify the total number of households determined by the calculation of the sample size.
- Prior to notifying the household that they were selected for verification, a confirmation review must be done by someone other than the determining official, to ensure that the application was determined correctly. The confirmation review must be documented. Any LEA that conducts a confirmation review of **all** applications at the time of certification is not required to conduct confirmation reviews at the time of verification. For more information, refer to the USDA's [\*Eligibility Manual for School Meals\*](#).
- LEAs must allow households to provide documentation of income from any point in time between the month prior to application and the time the household is required to provide income documentation for verification.
- If a household submits a paper application for a foster child and the foster child's name does not appear on the direct certification list, the foster child application is subject to verification if selected. For more information, refer to the USDA's [\*Eligibility Manual for School Meals\*](#).
- If a child's name appears on the direct certification list, they are not subject to verification.

## IMPORTANT POINTS FOR COMPLETING VERIFICATION, continued

- Residential child care institutions (RCCI) with **day students** must have approved meal applications or direct certification information on file to claim these day students as free or reduced. Verification must be conducted in those RCCIs that claim day students as free or reduced based on the approval of an application.
- Complete a [Verification Selection Worksheet](#) for **each selected household**. This tracks the verification process and must be kept on file.
- The following categories are **not** subject to verification and **cannot** be included in the total number of applications when determining the verification sample size: Students that are directly certified based on the direct certification list, homeless, runaways, foster children that are directly certified, and children enrolled in a federally funded Head Start Program.
- Do not collect social security information from the adults in the verified household.
- Go to USDA's [Foreign Language Translations](#) to find foreign language forms. LEAs must ensure that limited English proficiency households are provided adequate language assistance and understand the need to respond to the verification request.
- **Always round up** and make sure that the number of applications to be verified is correctly calculated. For example, if the sample size is 3.03, four applications must be selected for verification.
- Formal letters notifying households that they have been selected for verification must be sent and copies of these completed letters must be kept on file in the school district. Proper documentation is essential to demonstrate successful completion of the verification process. Keep copies of everything. **Verification cannot be conducted over the phone.** It must be done in writing.
- Letters of notification must give deadline dates for a response from the parents/guardians. Never say "as soon as possible" or "immediately." Indicate the consequences of the parent/guardian's failure to respond, i.e., their children will no longer be eligible for free or reduced-price meal benefits if they do not respond by the date indicated.
- All final letters notifying the household of a reduction in benefits due to verification must include **fair hearing procedures**. The Connecticut State Department of Education's (CSDE) sample letters of adverse action contain the fair hearing language (see [Adverse Action for Income Households](#) and [Adverse Action for SNAP/TFA Households](#)).
- If a student selected for verification transfers out of the system during the verification process, the LEA must select another household application to be verified. *Transfers and withdrawals should be determined at the time of the confirmation review.*
- Verification must be completed by **November 15**.

## IMPORTANT POINTS FOR COMPLETING VERIFICATION, continued

- If verification cannot be completed by November 15, the school district's superintendent must send a letter to the CSDE requesting an extension and providing the reason for the request. Send the letter to: Linda Hubeny, Child Nutrition Programs Director, Connecticut State Department of Education, Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457. Please copy Teri Dandeneau on the letter. This request must be received by the CSDE no later than **November 1**.
- Prior to completing the verification process, review and complete the [Sample School District Verification Checklist](#).
- The [Verification Collection Report](#) (FNS 742) must be completed by all LEAs participating in the National School Lunch Program and School Breakfast Program including those that do not conduct the verification process, e.g., RCCIs. This form is due by **December 15**. The CSDE will be providing additional information to SFAs on submitting the FNS 742.

The LEA has an obligation to verify all questionable applications, which is known as “verification for cause.” Verification for cause is **not** the same as the formal verification process. It can be done at any time throughout the school year. While it is not part of the formal verification process, the USDA requires that LEAs report all applications that were pulled for “verification for cause” on part VC-1 of the Verification Collection Report. For more information, refer to the USDA's [Eligibility Manual for School Meals](#).

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For more information, visit the CSDE's [Verification](#) Web page or contact the [school nutrition programs](#) staff in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457.

*This handout is available at [www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/verification/verpoints.pdf](http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/verification/verpoints.pdf).*